

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

**BARBARA LODER HILDEBRANDT,**

**Plaintiff,**

**vs.**

**HYATT CORPORATION, et al.,**

**Defendants.**

**Case No. C-1-02 0003**

**Judge Sandra Beckwith**

**DEFENDANTS' OBJECTIONS TO PLAINTIFF'S DEPOSITION DESIGNATIONS**

Defendants HYATT CORPORATION ("Hyatt"), TY HELMS ("Helms") and JACK HORNE ("Horne"), by and through their undersigned counsel, hereby submit the following Objections to Plaintiff's Deposition Designations:

Deposition of Molly Crompton

PAGE	LINES	DEFENDANTS' OBJECTIONS
4	Entire page	Not needed
5	Entire page	20-24 not proper because deposition advice
6	Entire page	1-24 not proper because deposition advice
7	1-7 and 12-24	1-15 not proper – personal, irrelevant, confidential
8	Entire page	
9	Entire page	
10	Entire page	
11	Entire page	22-24 not proper; commentary by counsel
12	Entire page	
13	Entire page	
14	1-14	22-24 not proper; commentary by counsel

15	15-24	
16	Entire page	
17	1-8 and 24	
18	Entire page	
19	1-23	
20	9-17	
22	11-22	
23	13-24	
24	Entire page	
25	Entire page	
26	Entire page	10-15 leading, improper foundation
27	Entire page	
28	Entire page	
29	1-15	Must add 16-29; deceptive and incomplete otherwise
30	22-24	
31	1-17	
32	7-24	
33	Entire page	
34	Entire page	14-24 irrelevant and improper; 10-11 leading & argumentative
35	Entire page	1-5 irrelevant and improper
36	Entire page	
37	Entire page	
38	Entire page	
39	1-11 and 24	
40	Entire page	
41	Entire page	17-20 leading, no foundation; 21-24 improper depo commentary
42	Entire page	1-2 improper depo commentary; 3-19 hearsay
43	Entire page	21-23 no foundation; assumes facts not in evidence
44	Entire page	
45	Entire page	22-24 leading, no foundation
46	Entire page	1-3 same as above
47	Entire page	
48	Entire page	
49	Entire page	
50	1-22	8-11, leading, no foundation
51	19-24	
52	Entire page	
53	1-17	
54	8-22	

55	8-14 and 22-24	
56	Entire page	3-6 leading, no foundation
57	1, 18-24	
58	1-14	
59	6-24	
60	1-22	
61	2-24	9-13 leading, no objection
62	Entire page	18-24 leading
63	Entire page	1-2 same
64	Entire page	
65	Entire page	
66	Entire page	
67	Entire page	
68	Entire page	
69	Entire page	4-9 leading, no foundation
70	1-16 and 19-24	
71	1-11	8-16 improper commentary
72	2-24	
73	1-11	
74	5-24	
75	Entire page	7-9 leading, no foundation; same for 21-24
76	Entire page	10-24 leading, no foundation
77	1 and 4	Same as above
78	23 & 24	
79	Entire page	
80	Entire page	19-24 leading, no foundation
81	1-10	
82	Entire page	
83	Entire page	20-24 improper, leading, no foundation
84	1-14	1-14 same – improper, leading, no foundation
85	None	
90	10-24	
91	Entire page	4-14 improper, leading, no foundation
92	Entire page	21-24 same as above
93	1-12	1-same, ditto for 4-12
94	8-24	11-16 leading, improper
95	1-3	
98	4-24	13-14 improper, leading, no foundation
99	Entire page	16-20 improper, leading, no foundation

113	6-24	6-24 improper, leading, no foundation
114	Entire page	1-3 same as above, 10-21 same as above
115	1-10 and 16-18	5-10 same as above

## Deposition of Brian J. Booth

PAGE	LINES	DEFENDANTS' OBJECTIONS
4	1-16	
5	7-24	Irrelevant
6	1-24	Irrelevant testimony regarding undisputed facts
7	1-16, 24	
8	1-24	Objection to lines 3-24-Mr. Booth has been found by Judge Beckwith not to have been involved in the RIF. Therefore his testimony in this regard is irrelevant and speculative
9	1-22	Same objection as p. 8
10	8-24	Same objection as p. 8 for lines 8-21. Lines 22-24 are subject to one of Defendants' Motions in Limine
11	1-3 and 8-24	Same objection as p. 8
12	1-6 and 12-23	Same objection as p. 8 for lines 1-6
13	2-19	
18	12-24	
19	1-24	
20	1-16	
21	8-17	The remainder of the page should be included
22	14-24	The entire page should be included
23	1-5	
25	5-24	
26	1-24	This page contains dialogue between the attorneys and should not be included
27	1-24	Irrelevant- Booth lacks personal knowledge regarding the subject testimony, and transcript contains dialogue between the attorneys
28	1-24	Lines 1-21 contain dialogue

		between the attorneys and should not be included
29	1-24	Information related to quotas and performance reviews as well as testimony related to matters already ruled upon in Judge Beckwith's ruling on the Motion for Summary Judgment are subject to Defendants' Motions in Limine
30	1-24	Same objection as p. 29
31	1-24	Same objection as p. 29
32	1-24	Same objection as p. 29
33	1-24	Same objection as p. 29
34	1-24	Same objection as p. 29
35	1-24	Same objection as p. 29
36	1-24	Lines 1-19 -same objection as p. 29. Lines 20-24 are subject to an agreed stipulation by the parties and must be excluded.
37	1	Subject to an agreed stipulation by the parties and must be excluded.
38	8-24	
39	1-24	Objection to the extent it contains hearsay
40	1-24	
41	12-24	
42	1-24	
43	1-24	
44	1-24	
45	1-24	
46	1-24	Same objection as p. 8
47	1 and 24	
48	1-24	Objection to the extent it calls for speculation and Booth lacks personal knowledge
49	9-14	Start at line 11 because 9-11 contains an answer to a prior question.
51	21-24	
52	1-24	
53	1-24	Same objection as p. 29
54	1-18	Same objection as p. 29
55	1-24	Same objection as p. 29
56	1-24	Same objection as p. 29

57	1-24	Same objection as p. 29
58	1-17	Same objection as p. 29
112	1-13	Same objection as p. 29
113	6-7	Same objection as p. 29
116	1-10	
124	7-11 and 16-18	Irrelevant, confusing and lacking any context
126	19-24	Same objection as p. 29
127	1-24	Same objection as p. 29
128	1-24	Same objection as p. 29
129	1-24	Same objection as p. 29 for lines 1-19.
130	1-24	
131	1-24	
132	23-24	Lacks personal knowledge and calls for speculation
133	1-24	Lacks personal knowledge and calls for speculation
134	1-24	Lacks personal knowledge and calls for speculation
135	1-24	Same objection as p. 29
136	1-24	Same objection as p. 29
137	1-24	Same objection as p. 29
138	1-24	Same objection as p. 29
139	1-24	Same objection as p. 29
140	1-24	Same objection as p. 29
141	1-24	Same objection as p. 29
142	1-24	Same objection as p. 29
143	1-24	Same objection as p. 29
144	1-24	Same objection as p. 29
145	1-24	Same objection as p. 29
146	1-24	Same objection as p. 29
147	1-24	Same objection as p. 29
148	1-24	Same objection as p. 29
149	1-24	Same objection as p. 29
150	1-24	Same objection as p. 29
151	1-24	Same objection as p. 29
152	1-24	Same objection as p. 29
153	1-24	Same objection as p. 29
154	1-19	Same objection as p. 29
161	1-24	Same objection as p. 29
162	1-24	Same objection as p. 29
163	1-24	Same objection as p. 29
164	1-24	Same objection as p. 29
165	1-24	Same objection as p. 29

177	15-24	Objection to the extent it lacks any time context
178	1-21	
179	1-16, 21-24	Lines 14-16 and 21 same objection as p. 8
180	1-13	
183	15-24	No personal knowledge and calls for speculation
184	1	No personal knowledge and calls for speculation

## Deposition of Catherine Petz

PAGE	LINES	DEFENDANTS' OBJECTIONS
4	1-22	Objection to line 14-22 as irrelevant.
5	Entire page	Objection as irrelevant
6	1-6	Objection as irrelevant
12	19-24	Need to include line 1 of p. 13 or the testimony is incomplete
16	18-24	
17	Entire page	Eliminate dialogue between attorneys (lines 8-11)
18	Entire page	
19	Entire page	Eliminate dialogue between attorneys (lines 14-16)
20	Entire page	
21	1-20	
23	Entire page	
29	21-24	Start at line 22
30	Entire page	
31	Entire page	
32	1-21	Either end at line 20 or line 22 or testimony is incomplete
38	16-24	
39	1-15	
40	4-24	
41	Entire page	
42	1-2	
46	1-8	
47	23-24	
48	1-7	
53	12-23	
54	11-16	

## Deposition of Edward W. Rabin

PAGE	LINES	DEFENDANTS' OBJECTIONS
4	1-24	Irrelevant
5	1-24	Lines 1-14 are irrelevant
6	1-24	Lines 8-21 are irrelevant
7	1-24	
8	1-7 and 14-24	
9	1-24	
10	1-24	
11	1-24	
12	1-24	Lines 22-24 are inappropriate dialogue of counsel
13	1-24	
14	1-24	
15	1-24	
16	1-24	
17	1-24	
18	1-24	
19	1-24	
20	1-24	Lines 23-24 are irrelevant and inappropriate
21	1-24	
22	1-23	Need all of p. 22 and lines 1-19 on p. 23 or the testimony does not make sense
26	21-24	
27	1-24	
28	1-24	
29	1-24	Lines 3-6 consist of dialogue of counsel
30	1-24	
31	1-24	
32	1-24	
33	1-14	
35	3-24	
36	1-24	
37	1-24	
38	1-24	
39	1-21	
41	2-24	
42	1-17	
43	14-24	Start at line 19
44	1-24	Lines 22-24 are inappropriate and should be excluded
45	22-24	Eliminate lines 22-24
46	1-12	
51	14-24	Eliminate lines 19-21
52	1-24	
53	1-24	

54	1-24	
55	1-24	
56	1-11	Add lines 21-24 and lines 1-16 on page 57 or testimony is incomplete
57	17-24	Add line 1-16
58	1-8	

Dated: August 4, 2004

Respectfully submitted,  
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By: s/Theresa M. Gallion by  
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authorization of 8/4/04

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ATTORNEYS FOR DEFENDANT  
HYATT CORPORATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 2, 2004, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Stanley M. Chesley, Esq. and Robert Steinberg, Esq., Waite, Schneider, Bayless, & Chesley Co., L.P.A., 1513 Central Trust Tower, Cincinnati, Ohio, 45202, Michael J. O'Hara, Esq., O'Hara, Ruberg, Taylor, Sloan & Sargent, 209 Thomas More Park, Suite C, P.O. Box 17411, Covington, Kentucky 41017-0411.

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